

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Presentment Date and Time:
March 31, 2015, 12:00 noon

In re: X

Chapter 11

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Case No. 09-50026 (REG)

Debtors.

X

NOTICE OF PRESENTMENT OF STIPULATION AND ORDER OF SETTLEMENT AND
LIMITED MODIFICATION TO ENVIRONMENTAL RESPONSE TRUST CONSENT
DECREE

PLEASE TAKE NOTICE that, pursuant to Local Bankruptcy Rule 9074-1(b), the United States of America, by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, will present the attached proposed Stipulation and Order, upon the consent of all still-existing signatories to the Environmental Response Trust Consent Decree and Settlement Agreement Among Debtors, the Environmental Response Trust Administrative Trustee, the United States, fourteen specified states acting in each of the states' own name or in the name of their authorized environmental agencies, and the Saint Regis Mohawk Tribe (the "**ERT Consent Decree**," approved by the Confirmation Order, Dkt. No. 9941 (March 29, 2011)), to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on March 31, 2015, at 12:00 noon. While the proposed Stipulation and Order's own terms are controlling and are not modified by this Notice of Presentment, if and when approved by the Court, the proposed Stipulation and Order shall modify the ERT Consent Decree by deferring for fifteen additional years the current March 31, 2015, deadline by which the Restoring Auto Communities Environmental Response

(“**RACER**”) Trust must repay specified administrative reserve funds to the United States Department of the Treasury, and will permit use of those funds to fund environmental Cushion Funding Account requests in circumstances specified by the Stipulation and Order and the ERT Consent Decree.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Bankr. P. 9074-1(b), objections, if any, must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned, by no later than 11:30 a.m. on March 31, 2015. Unless objections are received by that time, the Stipulation and Order may be signed. The parties respectfully request that the Court (if possible) sign the Stipulation and Order on March 31, 2015, in light of the current March 31, 2015 deadline for the return of the funds at issue to the United States Treasury.

Dated: New York, New York
March 24, 2015

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Defendant

By: /s/ David S. Jones
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Donald G. Frankel
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U.S. Department of Justice,
Environment and Natural Resources Division

TO: All parties via ECF notification

And by email to:

Joseph Smolinsky, Esq.

Thomas Moers Mayer, Esq.

Matt Williams, Esq.

Counsel for all signatories to the proposed Stipulation and Order

And by fax to the Office of the U.S. Trustee, 33 Whitehall Street, New York, NY 10004